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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ROSALIA RAZO,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:21-cv-01802-BAK

STIPULATION AND ~~PROPOSED~~
ORDER FOR SECOND
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 31-day extension of time, from August 1, 2022 to September 1, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this extension. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR) from

1 the Eastern District. A review of the records received shows Counsel has received
2 at least 50 CARs, the majority of which were filed in June 2022.

3 Additionally, for the weeks of August 1, 2022 and August 8, 2022, Counsel
4 currently has 18 merit briefs, and several letter briefs and reply briefs. Additional
5 time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause

8 Respectfully submitted,

9 Dated: July 22, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

11 By: /s/ Jonathan Omar Pena
12 JONATHAN OMAR PENA
13 Attorneys for Plaintiff

15 Dated: July 22, 2022

16 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration

21 By: * Andrea Banks, Esq.
22 Andrea Banks, Esq.
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on July 22, 2022)
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ORDER

Pursuant to stipulation, and cause appearing, Plaintiff's request for an extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before September 1, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: July 25, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE